

## **Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals**

12 December 2019

### **Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals**

#### **Thirty-eight session**

Geneva, 11-13 December 2019

Item 2 (b) of the provisional agenda

#### **Classification criteria and related hazard communication: review of Chapter 2.1**

### **Outcome of the discussions in the meeting of the informal correspondence group on the review of GHS Chapter 2.1 on the 11:th December 2019**

#### **Transmitted by the expert from Sweden**

1. The Informal Correspondence Group (ICG) on the review of Chapter 2.1 convened on Wednesday the 11:th December 2019, as part of the 38:th session of the SCEGHS. The meeting was chaired by the expert from Sweden, who leads the ICG, and conducted according to the agenda as presented in the annex to INF.26.
2. After having introduced the advanced draft of a new Chapter 2.1 as presented in annex I to INF.6, and summarized the main comments that had been given within the ICG, the expert from Sweden turned to the three open issues on hazard communication that were addressed in INF.6, as announced in agenda point 3.

#### **The symbol, or no symbol, for Sub-category 2C (agenda item 3a)**

3. A presentation was given illustrating the criteria for Division 1.4 S, which is a prerequisite to qualify for Sub-category 2C, and the further criteria for the Sub-category 2C. Effects from practical testing were shown for explosives that would qualify for Sub-category 2C versus explosives that would not, for comparison. A number of examples of explosives that would likely be classified as Sub-category 2C were also shown, whereof the vast majority were small articles.
4. Most experts that spoke felt that Sub-category 2C should have a symbol, and that that symbol should be either the flame (GHS02) or the exclamation mark (GHS07). There were however different opinions on which one of these symbols would be the better in relation to the hazard posed. Some experts felt that the flame would be the more appropriate as it is an existing symbol for physical hazards and is well understood. Others felt that the exclamation mark would be the better option, as the majority of the explosives in Sub-category 2C would pose more of a projection than a fire hazard. In summary, there appeared to be some preference towards the exclamation mark over the flame, and neither the exploding bomb nor having no symbol at all was deemed to be adequate.

#### **The hazard statements for Sub-categories 2B and 2C (agenda item 3b)**

5. The various options for hazard statements as in INF.26 were presented and discussed. None of these options were particularly favoured. Some experts were of the view that it would not be a problem to retain the hazard statement "Fire or projection hazard" (H204) for both sub-categories. Other experts

expressed that the statements should preferably be differentiated, with the statement for Sub-category 2B being stronger than that for Sub-category 2C. Most experts that spoke were of the opinion that the word “minor” would not be appropriate in a hazard statement, at least not in the beginning of it, as it appears somewhat contradictory to warn for a minor hazard.

**Informing on the division on the GHS label (agenda item 3c)**

6. The versions of precautionary statements in INF.26 were presented and discussed. There were no strong views on which version of these quite similar options to choose, but further explanation regarding the need to include an option for stating more than one division was desired. It was also pointed out that in order to make sure that the new precautionary statement would always be combined with the existing precautionary statement P234 (Keep only in original packaging), it would probably be better to introduce a completely new precautionary statement for explosives that includes both these texts.

**Closing of the meeting**

7. As time had run out, any further discussions on issues relating to the new Chapter 2.1 were not possible. The expert from Sweden rounded the meeting of by showing the path forward to fulfil the goal of the program of work, i.e. to introduce a new Chapter 2.1 for the 9:th revised edition of the GHS.

## Annex

### Provisional agenda for the meeting of the Informal Correspondence Group (ICG) on the review of GHS Chapter 2.1 on 11 December 2019

The basis document is UN/SCEGHS/38/INF.6-UN/SCETDG/56/INF.8, henceforth termed INF.6.

1. Brief introduction to the advanced draft of Chapter 2.1 (see annex I to INF.6)
2. Summary of comments received in the ICG
3. Main open issues – hazard communication

a) The symbol, or no symbol, for Sub-category 2C (see paragraph 9 of INF.6)

Possible options from the ICG:

			No symbol
GHS01	GHS02	GHS07	

b) The hazard statements for Subcategory 2B and 2C (see paragraphs 10-11 of INF.6)

Possible options from the ICG (based on current hazard statement H204 for Division 1.4):

Category	2B	2C
Hazard statement	Fire or projection hazard	Minor fire or projection hazard
Hazard statement	Fire or projection hazard	May cause a fire or projection hazard
Hazard statement	Fire or projection hazard	Fire hazard or minor projection hazard
Hazard statement	Severe fire or projection hazard	Fire or projection hazard

c) Informing on the Division on the GHS label (see paragraphs 12-15 of INF.6)

Possible options from the ICG:

Code	Precautionary statement	Conditions for use
P2XX	Division ... in transport configuration.	- <i>may be omitted if the explosive may become part of different transport configurations with different transport divisions</i> ...Manufacturer/supplier or the competent authority to specify the transport division.
P2YY	Division ... [or ...] in transport configuration.	- <i>text in square brackets to be included where different transport divisions may result depending on the transport configuration</i> ...Manufacturer/supplier or the competent authority to specify the transport division(s).

PXX and PYY could form a combination statement with the existing P234 - “Keep only in original packaging” (i.e. P234+PXX or P234+PYY, respectively). Another option is to form a new statement P2ZZ “Keep only in original packaging. Division ... [or ...] in transport configuration.”.

4. Any other issues regarding the draft chapter
5. The way forward